June 11, 2003

Mr. William T. Hawk Undersecretary for Marketing & Regulatory Programs U.S. Dept. of Agriculture, Stop 0249, Room 2092-S 1400 Independence Ave. S.W. Washington, D.C. 20250-0249

Dear Mr. Hawks,

On behalf of the nation-wide members of the Ecology Center, I am writing to urge you to come up with simple, effective guidelines for the mandatory country of origin labeling program, such as those recommended by the Americans for Country of Origin Labeling Coalition.

Consumers deserve more information about the food we feed to our families, and where it was produced. This seems even more urgent now, as food safety and disease outbreaks have occurred with disturbing regularity around the world in recent years. Without country of origin labeling we cannot make an informed decision about what we are buying, and we cannot use our purchasing power to support domestic farmers and producers. We understand there is a great deal of controversy about how to implement mandatory country of origin labeling, and we urge you to keep several points in mind as you develop the rules.

- * Retailers and packers have already signaled their intent to put a greater burden on suppliers than is required by the Farm Bill, as some packers are demanding that producers obtain a third-party certification of origin. This is unnecessary and unfair to small producers who already face enough obstacles.
- * Any labeling program should place a record-keeping burden only on processors/packers and retailers. This can be accomplished by giving the only authority to conduct audits to USDA, and instructing processors and retailers to add country of origin information to existing paperwork transactions.

 * USDA should maximize the number of foods that will be labeled. Enhancing a
- covered product by adding water, flavoring, salt, or other seasoning should not exclude it from the labeling requirements, nor should cooking, curing, or roasting.

We urge you to make sure that the rules for mandatory country of origin labeling live up to their potential, and allow us to know where our food is produced, just as we know where other consumer goods such as clothing are produced.

Sincerely,

Anna Harlowe

Issues Coordinator